

With regard to RM-10867, the Petition for Rule Making of the "Amendment of Part 97 of the Commission's Rules Governing the Amateur Radio Service to Implement Changes to Article 25 of the International Regulations Adopted at the 2003 World Radio Telecommunications Conference," I wish to submit the following comments.

The American Radio Relay League (ARRL), sometimes called the National Association for Amateur Radio, has recently petitioned the Commission to reduce the telegraphy requirements for amateur operations on the high frequency radio bands and again to streamline the current licensing structure. The reasoning provided by the ARRL is that such changes "would create an encouraging licensing framework looking towards the next decade." However, if one looks at the decade just past, the same ARRL submitted a similar petition to the Commission in 1998, which resulted in subsequent changes to the amateur radio service in 2000. Has the nature of the amateur radio service changed so drastically in that interim so as to warrant these proposed additional changes? I would propose that the answer to this question is in the negative.

The ARRL suggests its petition that the current telegraphy requirement is a hindrance to the participation on the part of certain individuals in the amateur radio service, particularly in the existence of the current Technician class license. The ARRL states that the current Technician class license "leads to disinterest, and to the failure to upgrade one's license class, and it focuses on the mindset of licensees on local communications." If this is so, why have countless amateurs taken advantage of the 2000 lowering of the telegraphy requirement to become General and Amateur Extra operators? I am included among the number of amateurs who took advantage of this reduction in the telegraphy requirement and who did upgrade his license. Again, if the current Technician class license and the corresponding telegraphy requirement for higher license classes "leads to disinterest, and failure to upgrade one's license," then why has the total number of amateur radio licensees within the United States continued to expand from the period of 2000 to the present? The ARRL states that the "Amateur Service requires some assistance now in addressing some very specific affecting the future growth of the service." Clearly, the data which shows growth in the overall size of the amateur service does not logically support this claim.

There is no immediate need warranting action on the part of the Commission regarding the Amateur Radio Service. I propose a 10 year moratorium on any additional changes to the Amateur Radio Service in regards to the licensing class structure and to the telegraphy requirements. This would enable the Commission to conduct further inquiry into the various claims proposed by the American Radio Relay League.

Respectfully submitted,

Joshua Long, N8CFS